

EXHIBIT 1

1
2 **IN THE UNITED STATES DISTRICT COURT**
3 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

4 IN RE: SOCIAL MEDIA ADOLESCENT
5 ADDICTION/PERSONAL INJURY PRODUCTS
6 LIABILITY LITIGATION

MDL No. 3047

Case No.: 4:22-md-03047-YGR-PHK

7 THIS DOCUMENT RELATES TO:

6 **DECLARATION OF FRANCES HAUGEN**
7 **IN SUPPORT OF SUPPLEMENTAL**
8 **BRIEF**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

9 ALL MATTERS

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1 I, Frances Haugen, declare as follows:

2 1. I am over the age of 18 and have personal knowledge of the following facts. I could
3 competently testify to these facts if called upon to do so.

4 2. I provide this Declaration to provide additional information concerning the harms
5 and violations of my First Amendment rights posed by the documents subpoena served on me by
6 Meta at my home on March 4, 2025 (the “Documents Subpoena”), as well as the subpoena for
7 testimony served on me the same day (the “Deposition Subpoena”).

8 3. I was an employee of Facebook, Inc. (now known as Meta) from June 2019 to May
9 2021. I blew the whistle on Facebook in 2021 due to grave concerns during my time at Facebook
10 about the prioritization of profits over safety and endangering lives.

11 4. Today, I dedicate my time to serving as an advocate for accountability and
12 transparency in social media. I am the founder and Chief Executive Officer of Beyond the Screen,
13 a nonprofit dedicated to bringing technical expertise and insider experience to a growing
14 ecosystem of checks and balances to drive social media for the common good. In that position, I
15 advocate for building an ecosystem of accountability for the social media industry. As part of its
16 mission, the nonprofit and I associate with others, including governments, civil society groups,
17 academics, journalists, writers, authors, investigators and other concerned citizens, to discuss
18 solutions for what it sees as key issues facing the public because of the social media industry,
19 which includes discussing Meta.

20 5. I strongly believe that social media has the potential to bring out the best in
21 humanity and have worked tirelessly since my departure from Facebook to help effectuate
22 responsible development and regulation of social media platforms. I have made public statements
23 and testified before Congress and other regulatory bodies across the world about my views on

1 these topics. These statements have included criticisms of Meta. I have also had numerous private
2 communications reflecting my thoughts on these topics, including my thoughts on petitioning the
3 government.

4 6. I authored an investigative book, *The Power of One*. It discusses, among other
5 topics, my efforts to gather documents from Facebook and investigate its algorithms and the harms
6 they caused, as well as what the company knew about these harms and the company's failure to
7 address them. My intention in gathering these documents was to share them with the public out of
8 great concern for the harms I was witnessing. I did so through the Facebook Files and through *The*
9 *Power of One*. As I wrote in the book, "I wanted the world to know what Facebook knew."
10 FRANCES HAUGEN, THE POWER OF ONE 248 (2023). Although the book discusses my
11 investigation's collaboration with some of my sources and collaborators, like Jeff Horwitz of the
12 *Wall Street Journal*, I intentionally did not share all of our communications and methods in the
13 book; nor did I discuss all of my sources and methods used in my investigation of Facebook for
14 *The Power of One*, my Senate and House testimony, and my disclosure of Facebook documents.
15 My work with Mr. Horwitz was complementary and essential to my investigation and work as a
16 social critic and author of an investigative book, and he served as one of my sources for my
17 investigation of Facebook and for *The Power of One*. See id. at 279 ("I could not have collected
18 the information to disprove Facebook's misrepresentations without [Jeff].").

19 7. The Documents Subpoena would require me to disclose 13 years of my confidential
20 documents and communications with a variety of individuals and organizations spanning a vast
21 range of topics. It demands disclosure of my non-public communications with fellow social critics
22 such as, among others, other former Meta employees, members of the news media, other nonprofits
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1 across the globe, state agencies, book publishers, class action lawyers, and whistleblower
2 lawyers—and even with my own lawyers, public relations, and government relations teams.

3 8. Enforcement of the Documents Subpoena will chill my future communications
4 about Meta and other social media platforms because I will be afraid that my personal, non-public
5 communications with others about these topics will be the target of a subpoena and I will be
6 compelled to disclose them. Others have told me that they will have the same fear communicating
7 with me and that it will chill what they are willing to share. That fear will greatly impact what I
8 write, with whom I feel I can freely speak, and with whom I associate. I would not write as often
9 or as critically of social media companies; I would also be forced to be more cautious about
10 communicating with others on these topics and would curtail whether I associate at all with other
11 social critics, academics, nonprofits, state agencies, and others to discuss issues related to the social
12 media industry; and, if so, how I communicate with them and how frequently I communicate with
13 them (or not).

14 9. The Documents Subpoena will also impede my work. If enforced, I would be
15 compelled to produce my drafts and research (Requests 3 and 16) and my documents and
16 communications concerning payments I have received for my work speaking out about the harms
17 posed by social media platforms (Request 15). I would be less inclined to conduct research and
18 write about it, and I would be less inclined to accept invitations to speak in the future if I am afraid
19 that social media companies that I have criticized, such as Meta, are able to gain invasive
20 information about my research and writing or how much I am being paid to speak.

21 10. Several other requests are so broad that they even call for my confidential
22 communications about the development of my own book, which is critical of Meta and issues
23 relating to social media platforms and is based on my investigation at Meta of internal documents

1 that led me to blow the whistle. In developing my book, I confidentially communicated with other
2 social critics, including Jeff Horwitz, who authored *Broken Code*, a book that is critical of
3 Facebook and the company's awareness of the harms its algorithms were causing. The Documents
4 Subpoena also calls for confidential communications about my work in founding Beyond the
5 Screen. Compelled disclosure of my communications on these topics would hinder me from
6 communicating about these topics in the future with fellow social critics and others. This
7 compelled disclosure would chill my desire and opportunity to be an author in the future, as well
8 as chilling my dedication to my nonprofit, out of fear that all of my confidential communications
9 and drafts would be at risk of disclosure.

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11 11. Nearly all of the individuals and entities with whom I communicate do so with an
12 expectation of confidentiality due to the highly sensitive nature of the work I, and they, are doing.
13 This includes consulting on issues arising from the negative externalities of social media platforms
14 and engaging with lawmakers, domestically and internationally, on the same as they develop
15 legislation concerning social media platforms.

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17 12. My associations with others will be impaired if I am required to respond to the
18 Subpoenas in full, because the Subpoenas will have a chilling effect on them as well as on me. I
19 will be required to self-censor my own communications out of concern over potential exposure,
20 and I expect others will do the same. Others with whom I have regularly communicated about
21 shared criticisms of Meta and social media companies are likely to stop or curtail their
22 communications with me if I am required to disclose communications that fall within this
23 Subpoena, out of fear that their documents and communications are equally at risk of disclosure. I
24 am afraid that others will be less likely to communicate with me in the future if they see that they
25 could be punished with invasive and chilling subpoenas for doing so, particularly many of the
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1 nonprofits with whom I associate, who operate on extremely small budgets and cannot take the
2 financial risk of being drawn into litigation by Meta or similar companies. As a result, I will not
3 be able to communicate with nonprofits and with individuals who are also critical of issues related
4 to social media as effectively, and I will be isolated from others operating in the space of social
5 media safety.

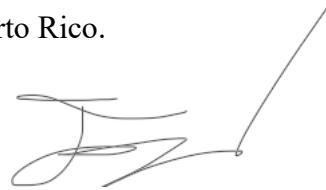
7 13. My advocacy work on social media safety will be severely harmed by this chilling
8 effect as well. The Documents Subpoena seeks, for example, “[a]ll Documents and
9 Communications concerning research or analyses related to the use of Social Media Platforms by,
10 the safety of, or the sexual exploitation of persons under 18.” This Request—only one of the 23
11 requests in the Documents Subpoena—would touch upon much of the work done at Beyond the
12 Screen. I, and the employees of Beyond the Screen, would be required to self-censor our
13 communications if they are at risk of being disclosed to one of the most powerful private
14 companies in the space within which we work. This would chill our communications about the
15 social media industry, significantly hindering the work we do to advocate for an ecosystem of
16 accountability for social platforms.

19 14. I believe that the Subpoenas are an act of retaliation against me by my former
20 employer and an attempt to isolate me from my community. I do not believe that this retaliation is
21 limited to me: I am aware that Meta has made greater attempts to use the judicial system and
22 compelled testimony to silence its whistleblowers, including Sarah Wynn-Williams, in recent
23 months. I am also aware that Meta issued expansive document requests to other former Meta
24 employees, including Arturo Béjar and Vaishnavi Jayakumar, which were recently quashed by this
25 Court. I am greatly concerned that disclosing my confidential communications with others could
26 equally place them at risk of retaliation by Meta, a powerful company with significant resources.

1 15. Enforcement of the Deposition Subpoena would have the same chilling effect on
2 me as disclosing the documents themselves, as I would be required to testify about the contents of
3 the confidential documents and communications described above. I am also concerned that
4 testifying about my communications with others, including nonprofits, members of the news
5 media, others critical of Meta and issues concerning social media platforms, and the other entities
6 described in the Documents Subpoena, would have the same chilling effect on my associations
7 with others because they may be more cautious about communicating with me if their
8 communications may be the subject of compelled testimony. In the future, I would be less open in
9 the ways that I communicate about social media platforms and related issues knowing that my
10 non-public communications may be required to be the subject of deposition testimony.

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15 I declare under penalty of perjury under the laws of the United States of America, pursuant to 28
16 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

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18 Executed this 24th day of July, 2025, in Carolina, Puerto Rico.
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Frances Haugen
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